

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,
on behalf of herself and others similarly situated,

Case No. 21 Civ. 8469

Plaintiff,

-against-

DARREN K. INDYKE and RICHARD D. KAHN,
as EXECUTORS OF THE ESTATE OF JEFFREY E.
EPSTEIN, and LESLEY GROFF,

Defendants.

JOINT STIPULATION AND PROPOSED ORDER STAYING ACTION

WHEREAS Plaintiff Jane Doe and the remaining defendants in this action, Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jeffrey E. Epstein (the “Co-Executors”) (together, the “Parties”) have agreed to engage in a mediation with an outside mediator on January 19, 2022 in an effort to explore a possible resolution of Plaintiff’s claims against the Co-Executors; and

WHEREAS the Parties seek to preserve their resources and judicial economy by staying this action until after the Parties determine whether the action can be resolved through the mediation process; and

WHEREAS should the Parties reach an agreement to resolve Plaintiff’s claims against the Co-Executors via the mediation process, the Parties will thereafter promptly discontinue this action with prejudice.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, that:

- for 45 days.
1. The captioned action is hereby stayed ~~pending the outcome of the mediation~~

~~XXXXXX The Parties shall file a status report no later than January 26, 2022 to report whether~~

~~the matter has resolved or if the stay should be lifted.~~
~~XXXXXX expiration~~

3. After the ~~lifting~~ of the stay, if any, the Parties will confer on a schedule for this action.

4. The initial pretrial conference is adjourned to February 28, 2022 at 12 p.m.

Respectfully submitted,

Dated: New York, New York
December 31, 2021

CUTI HECKER WANG LLP

Dated: New York, New York
December 31, 2021

TROUTMAN PEPPER HAMILTON
SANDERS LLP

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*Attorneys for Defendants Darren K. Indyke and
Richard D. Kahn, as Co-Executors of the Estate
of Jeffrey E. Epstein*

SO ORDERED:


P. Kevin Castel
United States District Judge

Dated: 1/3/2022